

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**

SONY MUSIC ENTERTAINMENT, *et al.*,

*Plaintiffs,*

v.

COX COMMUNICATIONS, INC., *et al.*,

*Defendants.*

Case No. 1:18-cv-00950-LO-JFA

**DEFENDANTS' SECOND MOTION TO COMPEL**

Pursuant to Fed. R. Civ. P. 37 and E.D. Va. Local Rule 37, Defendants Cox Communications, Inc. and CoxCom, LLC (collectively, "Cox") respectfully move this Court to compel Plaintiffs Sony/ATV and EMI to produce information relating to the works-in-suit from their termination database including any related valuations, in response to Cox's requested discovery. Plaintiffs further move the Court to compel Plaintiffs to search for and produce any similar information maintained by the other plaintiff groups.

Cox states the specific grounds for their Second Motion Compel in the accompanying Memorandum and the Declaration of Thomas M. Buchanan and the exhibits attached thereto.

**LOCAL RULE 37(E) MEET AND CONFER STATEMENT**

The parties exchanged emails on June 19, June 20, June 21, and June 27, 2019 concerning this specific discovery request and its responsiveness to Cox's outstanding discovery requests.

On June 27, 2019, the parties conducted a meet-and-confer call during which the parties discussed their respective emails and the issues covered in this Motion.

Despite these extensive good-faith efforts, the parties were not able to come to resolution on Cox's outstanding requests that are the subject of the Motion.

Dated: June 28, 2019

Respectfully submitted,

/s/ Thomas M. Buchanan /

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**CERTIFICATE OF SERVICE**

I certify that on June 28, 2019, a copy of the foregoing DEFENDANTS' SECOND MOTION TO COMPEL was filed electronically with the Clerk of Court using the ECF system which will send notifications to ECF participants.

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